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Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Alarm Industry Communications Committee Petition for Emergency Relief Regarding 3G Transition

Ex Parte Notice in GN Docket No. 21-304

Dear Ms. Dortch,

The Alarm Industry Communications Committee and its constituent members (collectively "AICC"), respectfully submit this written ex parte report regarding the following zoom meetings: On January 10, 2022 a zoom meeting took place between Danielle Thumann of Chairman Carr's Office, and the following persons on behalf of AICC: Louis Fiore, AICC Chairman; Bill Signer of the Carmen Group; John Brady of Connect America; and the undersigned counsel. On January 12, 2022 a zoom meeting took place between Erin Boone of Chairman Simington's Office, and the same persons on behalf of AICC.

During each zoom conference, the AICC attendees discussed the persons and activities that will be adversely impacted if an extension of the AT&T 3G sunset is not granted, including the safety implications for school children discussed in the recent reply comments of Zonar Systems and the National Association for Pupil Transport. AICC representatives also discussed developments affecting the issues discussed in AICC's Petition, including such matters as the impact of the pandemic and related supply chain crisis on the alarm industry's effort to upgrade their 3G radios, versus the impact on AT&T's 5G roll out, pursuant to the observations made in AICC's September 14, 2021 Reply Comments and December 13, 2021 Ex Parte Comments.

AICC also noted:

- Every comment filed in the record (other than those of AT&T) supports an extension of the AT&T 3G Sunset.
- While early data may suggest the clinical severity of Omicron is less severe, the absolute number of those infected and requiring treatment could put an enormous strain on the healthcare system. Therefore the country is experiencing numerous shut downs due to Omicron. None of this messaging gives alarm customers the “all clear” to let outsiders like alarm installers and PERS technicians into their homes. The good news is a prediction that Omicron may burn itself out in a month or so, as was observed in South Africa. This could open the door for better success in obtaining access to customer premises; however, time will be needed to complete the installation process, subject to replacement radio availability.
- The 5G phones and devices of AT&T’s customers will still be able to summon help in the event of an emergency during the 3G extension. *In contrast, when AT&T shuts down its 3G network, all of the millions of remaining 3G users will instantly be shut off, and incapable of relaying vital safety related communications.*
- The alarm industry, through survey and member consultations, has determined that alarm companies have made significant progress in replacing 3G radios since the pandemic began, made all the more remarkable given the difficulty getting into customer premises due to Covid fear and shut downs, and the lack of replacement alarm radios due to the worldwide microchip shortage and supply chain issues. It is estimated that two thirds of 3G alarm radios have been replaced – but this leaves upwards of two million alarm customers that still need to be retrofitted, with only six weeks remaining before AT&T’s scheduled 3G service shutdown. The number of affected Americans remains much higher, as other 3G users have advised the FCC that a loss of AT&T’s service will compromise anti-collision systems in cars; telematics that automatically summon help in the event of a crash; school bus communications; rural users that have no 4G or 5G signal to use in summoning help if they break down in freezing temperatures; and others who depend on 3G for their safety.
- The alarm industry remains ready to discuss reasonable measures, including a shortening of its requested extension if warranted, and other steps that may reduce any impact on AT&T’s 5G plans while protecting against loss of life. AICC remains hopeful that with Commission assistance, an accommodation can be reached with AT&T to avoid this unnecessary risk to so many vulnerable Americans.

Consistent with section 1.1206 of the Commission’s rules, 47 C.F.R. §1.1206, one copy of this notice is being filed via ECFS in the above-captioned proceeding. Please direct any questions concerning the above matter to the undersigned at (202) 828-5540.

Respectfully submitted,

By: /s/ John A. Prendergast
John A. Prendergast
Attorney for AICC

cc: Meeting Attendees listed above